

**EXHIBIT B**

**Email string dated July 25, 2022**

**Jonathan Miller**

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**From:** Ricardo Bonilla <rbonilla@fr.com>  
**Sent:** Monday, July 25, 2022 12:01 PM  
**To:** C. Matthew Rozier; Cindy Hart; Travis Lynch; Adil Shaikh; Philip Brown; Neil McNabnay  
**Cc:** Jim McDonough; Jonathan Hardt; Jonathan Miller  
**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Matt,

IKEA NAS opposes AR Design's requests for leave to add any parties or functionalities to the case. To the extent AR Design insists on pursuing such leave, it will need to seek it from the Court.

Thanks,  
Riqui

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**From:** C. Matthew Rozier <matt@rhmtrial.com>  
**Sent:** Wednesday, July 20, 2022 11:29 AM  
**To:** Ricardo Bonilla <rbonilla@fr.com>; Cindy Hart <hart@fr.com>; Travis Lynch <lynch@rhmtrial.com>; Adil Shaikh <shaikh@fr.com>; Philip Brown <pgbrown@fr.com>; Neil McNabnay <McNabnay@fr.com>  
**Cc:** Jim McDonough <jim@rhmtrial.com>; Jonathan Hardt <hardt@rhmtrial.com>; Jonathan Miller <miller@rhmtrial.com>  
**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Riqui,

Thanks for the discussion today. We have confirmed that our client would agree to a one-month extension of all future scheduled dates in this case if Ikea would agree not to oppose our amendment of the Complaint or motion for leave to amend the infringement contentions. I note that claim construction doesn't even begin until October 27, 2022 and based on previous experience the Court routinely grants motions to amend infringement contentions at this stage of the case, even when new products are not introduced after filing of the original complaint, as they were here.

Our client's agreement to a one-month extension would be solely to avoid any unnecessary burden on the parties and Court from motions practice.

Please let us know your client's position by 2pm Central time on Monday as we need to move forward sooner than later.

Regards,

Matt

**C. Matthew Rozier**  
**Rozier Hardt McDonough PLLC**  
2590 Walnut Street  
Suite 10  
Denver, CO 80205  
O: 720.820.3006

C: 202.316.1591  
E: [matt@rhmtrial.com](mailto:matt@rhmtrial.com)



---

**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>  
**Date:** Tuesday, July 19, 2022 at 2:17 PM  
**To:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>, Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>, Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>  
**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Let's talk at 10:30AM CT – it shouldn't take too long. We can use the following dial-in:

Dial-In: 888-706-0584  
Participant Code: 1721440

---

**From:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>  
**Sent:** Tuesday, July 19, 2022 3:02 PM  
**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>; Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>; Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>  
**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

I'm free 10-11am Central, and can also do 3pm Central tomorrow.

---

**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>  
**Date:** Tuesday, July 19, 2022 at 1:58 PM  
**To:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>, Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>, Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>  
**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

I can't do Thursday. What's midday for you tomorrow? I'm tied up 12:30-3PM CT and then after 5PM CT.

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**From:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>  
**Sent:** Tuesday, July 19, 2022 2:47 PM  
**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>; Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>; Jonathan Miller

<[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>

**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Riqui,

I am tied up Friday but can fit in a call midday tomorrow or Thursday. Please let me know if either of those days would work.

Regards,

Matt

**C. Matthew Rozier**  
**Rozier Hardt McDonough PLLC**  
2590 Walnut Street  
Suite 10  
Denver, CO 80205  
O: 720.820.3006  
C: 202.316.1591  
E: [matt@rhmtrial.com](mailto:matt@rhmtrial.com)



---

**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>

**Date:** Tuesday, July 19, 2022 at 1:29 PM

**To:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>, Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>,

Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>

**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Matt,

We have had some scheduling issues connecting with our contacts overseas, but we do have a few questions for you, the answers to which could help us speed things along. I'm traveling the next two days – do you have time Friday for a call to discuss?

Thanks,

Riqui

---

**From:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>

**Sent:** Tuesday, July 19, 2022 10:18 AM

**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>; Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>; Jonathan Miller

<[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>

**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Riqui,

We have not heard back from you on the below. Please let us know your client's position on the Amended Complaint by noon this Friday, July 22.

Regards,

Matt

---

**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>

**Sent:** Tuesday, July 5, 2022 4:33 PM

**To:** Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>; Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>

**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Matt,

That is correct. Should we oppose, this delay will not serve as a basis for that opposition. We are conferring with our client regarding the discussions of last week and today, and we will endeavor to get back to you by next week.

Thanks,  
Riqui

On Jul 5, 2022 16:42, "C. Matthew Rozier" <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)> wrote:

Riqui,

I understand the call with Mr. Mitry was productive today, but that you are traveling through next week. As discussed, we are holding off on filing an amended complaint and amended infringement contentions for the newly announced product. I understand you would like us to continue holding off on those filings at least until next week. We assume that you will not use our willingness to hold off on those filings during your travel as a basis to oppose those filings, but please let us know if we are incorrect.

Safe travels,

Matt

---

**From:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>

**Date:** Wednesday, June 29, 2022 at 2:08 PM

**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>, Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>, Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Neil

McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>  
**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Riqui,

Thank you for confirming. Per the Court's rules (see below), we are preparing a Joint Report notifying the Court that the parties met and conferred and agree to withdrawn the Motion to Compel, which we believe moots the need for next weeks status conference. We will send a draft shortly.

\*\*\*\*\*

Within **72 hours** of the Court setting any discovery motion for a hearing, each party's lead attorney (*see Local Rule CV-11(a)*) and local counsel shall meet and confer in person or by telephone, without the involvement or participation of other attorneys, in an effort to resolve the dispute without Court intervention.

**Counsel shall promptly notify the Court of the results of that meeting by filing a joint report of no more than two pages.** Unless excused by the Court, each party's lead attorney shall attend any discovery motion hearing set by the Court (though the lead attorney is not required to argue the motion).

\*\*\*\*\*

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**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>  
**Date:** Wednesday, June 29, 2022 at 2:04 PM  
**To:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>, Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>, Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>  
**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Matt,

Thanks for your e-mail. We are discussing AR Design's requests with IKEA NAS, and we will get back to you with its position soon. In the meantime, we agree that if AR Design withdraws its currently pending motion to compel, IKEA NAS will not use that withdrawal as a basis to oppose any renewed motion to compel should AR Design decide to pursue such a motion in the future of this case.

Thanks,  
Riqui

---

**From:** C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>  
**Sent:** Wednesday, June 29, 2022 1:53 PM  
**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>

**Subject:** Re: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Riqui,

Thank you for the conversation today. As discussed, AR Design learned last week of the launch of the Ikea Kreative Product (<https://www.ikea.com/us/en/newsroom/corporate-news/ikea-launches-new-ai-powered-digital-experience-empowering-customers-to-create-lifelike-room-designs-pub58c94890>). Based on our analysis, IKEA Kreative also infringes the asserted patent. In view of that new product and to avoid unnecessary motion practice with the Court, we ask that your client agree not to oppose:

1. A motion to amend the Complaint to add Ingka Group and Inter IKEA Systems B.V. to the case through an Amended Complaint; and
2. A motion to amend AR Design's infringement contentions to include IKEA Kreative given that we were not aware and could not have been aware of that new product at the time the original Complaint was filed.

In addition, to provide time for your client to consider these requests, we will withdraw the pending motion to compel based on your representation that you will not use that withdrawal as a basis to oppose any renewed motion that may be necessary later in the case.

Regards,

Matt

**C. Matthew Rozier**  
**Rozier Hardt McDonough PLLC**  
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Suite 10  
Denver, CO 80205  
O: 720.820.3006  
C: 202.316.1591  
E: [matt@rhmtrial.com](mailto:matt@rhmtrial.com)



---

**From:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>

**Date:** Monday, June 27, 2022 at 4:36 PM

**To:** Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>, Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>, Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>, Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>, Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>

**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>, C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>, Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>, Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>

**Subject:** RE: AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

Counsel,

We are available on Wednesday from 1-2PM CT or after 3PM CT.

Thanks,  
Riqui

---

**From:** Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>  
**Sent:** Monday, June 27, 2022 3:04 PM  
**To:** Ricardo Bonilla <[rbonilla@fr.com](mailto:rbonilla@fr.com)>; Adil Shaikh <[shaikh@fr.com](mailto:shaikh@fr.com)>; Neil McNabnay <[McNabnay@fr.com](mailto:McNabnay@fr.com)>; Philip Brown <[pgbrown@fr.com](mailto:pgbrown@fr.com)>; Cindy Hart <[hart@fr.com](mailto:hart@fr.com)>  
**Cc:** Jim McDonough <[jim@rhmtrial.com](mailto:jim@rhmtrial.com)>; C. Matthew Rozier <[matt@rhmtrial.com](mailto:matt@rhmtrial.com)>; Jonathan Miller <[miller@rhmtrial.com](mailto:miller@rhmtrial.com)>; Jonathan Hardt <[hardt@rhmtrial.com](mailto:hardt@rhmtrial.com)>; Travis Lynch <[lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)>  
**Subject:** AR Design Innovations LLC v. IKEA North America Services - 2:21-cv-00465-JRG

[This email originated outside of F&R.]

Counsel,

Now that the Court has set a hearing (Dkt. No. 28) on Plaintiff's Motion to Compel in the above referenced case, please let us know your availability on Wednesday for a meet and confer.

Regards,

**Travis Lynch**  
**Rozier Hardt McDonough PLLC**  
3621 Vinings Slope SE,  
Suite 4300  
Atlanta, GA 30339  
Direct: 470.480.9514  
Email: [lynch@rhmtrial.com](mailto:lynch@rhmtrial.com)



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